

1
2 **UNITED STATES COURT OF APPEALS**

3
4 **FOR THE NINTH CIRCUIT**

5
6 UNITED STATES OF AMERICA,

7 Plaintiff-Appellee,

8 v.

9 JAMES BRADLEY VLHA and
10 TRAVIS SCHLOTTERBECK,

11 Defendants-Appellants.

No. 22-50281, 22-50283,
22-50312 (Cross Appeals)

D.C. No. 2:19-CR-00343-GW-1

**Unopposed Motion for
Extension of Time Under Fed.
R. App. P. 26(b) and Ninth
Circuit Rule 31-2.2(b)**

12
13 Appellant James Bradley Vlha under Federal Rule of Appellate
14 Procedure 26(b) and Ninth Circuit Rule 31-2.2(b), and for the reasons set
15 forth in the attached Declaration of Counsel, respectfully move to extend
16 the due date for filing the consolidated opening brief from March 24, 2023,
17 to May 19, 2023.

18
19 Respectfully submitted,

20 DATED: March 13, 2023

21 LAW OFFICE OF JEROME J. HAIG

22
23 By 

24 JEROME J. HAIG

25 Attorney for Defendant-Appellant
26 James Bradley Vlha
27
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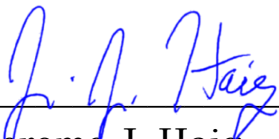
12 I, Jerome J. Haig, declare:

- 13 1. I am an attorney licensed to practice law in the State of California and
14 in this Court.
15 2. I am counsel for appellant James Bradley Vlha.
16 3. Mr. Vlha is not in custody.
17 4. Co-defendant and co-appellant Travis Schlotterbeck is not in custody.
18 5. The opening brief is due on March 24, 2023.
19 6. **Length of the requested extension:** I request an extension of the
20 due date for the opening brief, to May 19, 2023.
21 7. **Due Diligence:** I will make every effort to file the opening brief in
22 the time requested.
23 8. **No Court Reporter Default:** There is no court reporter default.
24 9. **No Opposition to the request.** Assistant United States Attorney
25 Brian Faerstein is unopposed to the request for extension of time.
26 Rachael Robinson, counsel for co-appellant, is unopposed to the
27 request for extension of time.
28

1 10. **Reasons for the requested extension:**

2 I am currently engaged in a jury trial in *People v. Ezequiel*
3 *Romo*, Case No. BA475969, pending in the Los Angeles County
4 Superior Court. Trial commenced on February 6, 2023, and is
5 due to conclude on April 14, 2023.

6
7 I declare under penalty of perjury that this declaration is true and
8 correct. Executed this 13th of March 2023.

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10 
11 _____
12 Jerome J. Haig

13 Declarant and Attorney for
14 Defendant-appellant James Bradley Vlha
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